

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**THE ESTATE OF JESSIE LEE  
WILLIAMS, JR., DECEASED BY  
AND THROUGH HIS NEXT FRIEND AND  
LEGAL REPRESENTATIVE, TERRY  
WILLIAMS, ADMINISTRATOR  
OF THE ESTATE OF JESSIE LEE WILLIAMS**

**PLAINTIFFS**

**VERSUS**

**CAUSE NO. 1:06CV196LG-RHW**

**HARRISON COUNTY, MISSISSIPPI, ET AL**

**DEFENDANTS**

**JOINDER IN MOTION TO STAY PROCEEDINGS**

COMES NOW, Defendant RYAN TEEL, by and through his attorney, the Honorable Jim Davis, files this his Joinder in Motion to Stay Proceedings and in support thereof would show the Court the following:

1. Defendant George Payne, Jr., in his official capacities as Sheriff of Harrison County, has filed a Motion to Stay Proceedings and for Additional Time to Answer Amended Complaint, stating that the February 4, 2006 incident which is the subject of this action is currently under criminal investigation by the Mississippi Bureau of Investigation and the Federal Bureau of Investigation , and that the pendency of those investigations will impede discovery in the civil action and prevent a resolution of the plaintiff's claims against certain defendants.

2. A stay as to some but not to all defendants would lead to inefficient, piecemeal litigation. This action should be stayed as to all defendants until such time as any criminal proceedings related to this incident have been fully resolved.

3. American Correctional Association appeared only to join in the motion to stay

proceedings, and by appearing did not waive any rights or defenses to which it would otherwise be entitled.

4. Defendant Ryan Teel likewise joins in the Motion to Stay and does not waive any defense or rights he may have.

5. Defendant Ryan Teel may have criminal prosecution against him. In some people's minds, the Defendant has already been convicted. He would be forced to exercise the Fifth Amendment Right Against Self-Incrimination concerning any questioning about the February 4, 2006 incident.

6. After being exonerated or convicted of criminal charges as they relate to February 4, 2006 incident, no Fifth Amendment immunity right exist. He then would be able to properly defend himself in relation to the complaint against him.

7. The Defendants contend they want the truth as to the events of February 4, 2006. The only way to secure the truth surrounding the events of February 4, 2006 is to have Defendant Ryan Teel freely speaking about the incident. If the Plaintiff actually want the truth they want all parties to be able to discuss the incident.

Wherefore, your defendant Ryan Teel joins the Motion to Stay Proceedings filed by Defendant George Payne for the reasons above stated.

RESPECTFULLY SUBMITTED this the 13<sup>th</sup> day of July, 2006

Ryan Teel, Defendant

By:

s/ Jim Davis  
HONORABLE JIM DAVIS  
Attorney for Defendants

**CERTIFICATE OF SERVICE**

I, JIM DAVIS, do hereby certify that on July 13, 2006, I electronically filed the foregoing Joinder in Motion To Stay Proceedings with the Clerk of Court using the ECF system and mailed same by US Mail to the following:

Michael Crosby  
John Whitfied  
2111 25<sup>th</sup> Avenue  
Gulfport, MS 39501

Cy Faneca  
Post Office Drawer W  
Gulfport, MS 39502

SO CERTIFIED, this the 13<sup>th</sup> day of July, 2006

s/Jim Davis  
HONORABLE JIM DAVIS  
Attorney for Defendants  
P.O. Box 1839  
Gulfport, Ms 39502  
Phone No. (228) 8641588  
MSB No. 5830

JIM DAVIS  
MSB # 5830  
Post Office Box 1839  
1904 24<sup>th</sup> Avenue  
Gulfport, MS 39501  
Phone: (228) 864-1588  
Fax: (228) 863-5008